Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services

STATEMENT OF BASIS

Baton Rouge Plant
Honeywell International Inc.
Baton Rouge, East Baton Rouge Parish, Louisiana
Agency Interest Number: 289
Activity Number: PER20060001
Proposed Permit Number: 0840-00001-V2

I. APPLICANT

Company:
Honeywell International Inc.
P.O. Box 2830
Baton Rouge, Louisiana 70821-2830

Facility:
Honeywell International Inc. - Baton Rouge Plant
Lupine & Ontario
Baton Rouge, East Baton Rouge Parish, Louisiana
Approximate UTM coordinates are 673.46 kilometers East and 3,372.41 kilometers North, Zone 15

II. FACILITY AND CURRENT PERMIT STATUS

Honeywell International Inc. (Honeywell) owns and operates the Baton Rouge Plant (BRP), a facility which manufactures flouro- and chlorofluorocarbon refrigerants. The facility is located at the intersection of Lupine Avenue and Ontario Street in Baton Rouge, East Baton Rouge Parish, Louisiana. The facility began operations in 1945 as a hydrofluoric acid plant; fluorocarbon production began in 1954. The facility was first granted an air permit, Permit No. 399, on December 17, 1974. The initial Part 70 Operating Permit, Permit No. 0840-00001-V0, for the Baton Rouge Plant was issued on September 20, 2001. General Permit No. 2848-V0 was issued on June 9, 2003; this permit was incorporated into Part 70 Operating Permit No. 0840-00001-V1 which was issued on March 3, 2006. The Baton Rouge Plant currently operates under Part 70 Operating Permit No. 0840-00001-V1.

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The Baton Rouge Plant (BRP) currently consists of three stand alone units for the production of chlorodifluoromethane (G-22, the G-22 Process Unit), chlorotrifluoroethylene (G-1113, the G-1113 Process Unit), and an Omni-products unit (the Omni Process Unit). The Omni Process Unit is currently capable of producing either trifluoroethane (G-143a), a combination of trichlorotrifluoroethane and dichlorotetrafluoroethane (G-113 & 114), a combination of trichlorofluoromethane and dichlorodifluoromethane (G-11 & 12), and G-22. Permit No. 0840-00001-V1 authorized the BRP to install a new stand alone unit for the production of tetrafluoroethane (G-134a cGMP, the G-134a cGMP Process Unit) which is a pharmaceutical grade of G-134a, to authorize the BRP to produce G-11/12, G-113/114 and G-143a as alternate products in the G-22 unit, and to simultaneously produce G-113/114 and G-143a or G-143a and G-134a cGMP as alternate operating scenarios in the Omni Unit. A summary of the alternate scenarios by production unit and the emissions associated with each alternate scenario are located in Tables 1 and 2 of this permit, respectively.

With the exception of G-1113, all of the previously described products have been designated as having negligible photochemical reactivity by the United States Environmental Protection Agency (USEPA); i.e., they are commonly referred to as non-reactive hydrocarbons (NRHC). As stated in 40 CFR 51.100(s), these chemicals are excluded from the definition of a volatile organic compound (VOC). The BRP also includes infrastructure facilities consisting of utilities and tankage, a refrigerant reclamation unit, and a calcium chloride plant, which utilizes the hydrogen chloride streams from the fluorocarbon plants as a basic raw material.

Honeywell International Inc - Baton Rouge South Works is a designated Part 70 source and continues to operate the entire facility, the Baton Rouge Plant, under one Part 70 permit, Permit No. 0840-00001-V1 issued on March 3, 2006.

III. PROPOSED PERMIT/PERMIT INFORMATION

Application

A permit application and Emission Inventory Questionnaire were submitted by Honeywell International Inc. on March 20, 2006 requesting a Part 70 operating permit renewal and minor modification for the Baton Rouge Plant. Honeywell's initial Part 70 operating permit for the BRP expired on September 20, 2006; however, the permit has been administratively continued, since Honeywell submitted a timely and complete renewal application on March 20, 2006. On April 20, 2007, Honeywell submitted a revision to the renewal application which revises and replaces the March 20, 2006 submittal in its entirety. Additional information, dated October 2, 2007 and January 24, 2008, was also submitted.

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Proposed Permit

In addition to serving as an application for permit renewal, this permit revision addresses the following proposed changes (minor modifications) to the current Title V permit:

1. The removal of mobile non road engines, which are regulated under Title II, as emission point sources regulated under the permit.

2. The installation of internal floating roofs in three storage tanks (EPNs 830, 855A and 855 B), which will result in a change in the compliance technology under the SOCMI-HON for these storage tanks.

   Note: EPNs 830, 855A, and 855B shall continue to comply with the closed-vent system and control device requirements of HON 40 CFR 63.119(e) of Subpart G and LAC 33:III.2103 as stated in Permit No. 0840-00001-V1 issued on March 3, 2006 until the installation of the internal floating roof is completed on the respective tank. Once the installation is completed, the respective storage tank shall comply with the internal floating roof requirements of HON and LAC 33:III.2103 as stated in this permit.

3. The miscellaneous revisions to the emissions calculations to reflect minor changes in the expected operation of the facility.

Permitted Air Emissions

Estimated emissions in tons per year (TPY) for the Baton Rouge Plant are as follows:

Pollutant	Before	After	Change
PM_{10}	19.08	18.71	- 0.37
SO_2	1.02	0.79	- 0.23
NO_X	58.40	55.46	- 2.94
CO	47.93	37.67	- 10.26
VOC [1]	380.77	387.81	+ 7.04
ODS[2]	1,533.57	1,540.07	+ 6.50

[1] See VOC Speciation below
[2] Ozone Depleting Substances

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[1]VOC LAC 33:III.Chapter 51 Toxic Air Pollutants (TAPs)			
Pollutant	**Before**	**After**	**Change**
Benzene	0.002	0.002	0.00
Bromoform	<0.001	<0.001	0.00
Carbon Tetrachloride	10.11	7.44	- 2.67
Choroethane	<0.001	0.04	+ 0.04
Chloroform	13.94	13.94	0.00
Cumene	<0.001	<0.001	0.00
1,1-Dichloroethane	<0.001	<0.001	0.00
1,2-Dichloroethane	0.04	0.04	0.00
Ethyl Benzene	2.94	<0.001	- 2.94
Formaldehyde	0.10	0.05	- 0.05
n-Hexane	0.002	0.002	0.00
Methyl Ethyl Ketone	7.37	2.37	- 5.00
Methanol	97.41	97.41	0.00
Methyl Bromide	<0.001	<0.001	0.00
Methyl Chloride	17.52	17.56	+ 0.04
Methyl Tertiary Butyl Ether	0.03	0.03	0.00
Phosgene	0.013	0.013	0.00
1,1,2,2-Tetrachloroethane	0.002	0.002	0.00
Toluene[3]	0.002	0.002	0.00
Trichloroethylene	<0.001	<0.001	0.00
2,2,4-Trimethylpentane	<0.001	<0.001	0.00
Vinyl Chloride	0.07	0.07	0.00
Vinylidene Dichloride	10.91	10.91	0.00
Xylene[3]	15.50	14.04	- 1.46
Total	**175.96**	**163.92**	**- 12.04**

[3] Highly Reactive Volatile Organic Compound (HRVOC)

Other VOC (TPY):	223.89

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Non-VOC LAC 33:III.Chapter 51 Toxic Air Pollutants (TAPs)			
Pollutant	**Before**	**After**	**Change**
Antimony	0.06	0.06	0.00
Antimony Compounds	0.13	0.13	0.00
Cobalt	0.001	0.001	0.00
Cobalt Compounds	0.008	0.008	0.00
Chlorine	10.52	10.21	- 0.31
Dichloromethane	0.001	0.001	0.00
Hydrochloric Acid	17.97	16.15	- 1.82
Hydrogen Fluoride	15.80	11.95	- 3.85
Sulfuric Acid	0.27	0.22	- 0.05
Tetrachoroethylene	5.36	5.41	+ 0.05
1,1,1-Trichloroethane	9.83	3.66	- 6.17
Titanium (IV) Chloride	10.32	10.32	0.00
Zinc Compounds	0.20	0.20	0.00
Total	**70.47**	**58.32**	**- 12.15**

Table 1 – Alternate Operating Scenarios

Production Unit	Scenario (w/TEMPO ID No.)
G-22 Process Unit	G-22 Production (SCN0001) G-11/12 Production (SCN0002) G-143a Production (SCN0003) G-113/114 Production (SCN0004)
Omni Process Unit	G-143a & G-134a cGMP simultaneous production (SCN0006) G-11/12 Production (SCN0007) G-22 Production (SCN0008) G-113/114 Production (SCN0005) G-113/114 & G-143a simultaneous production (SCN0009)
G-1113 Process Unit	Existing Configuration (SCN0010) Expanded Configuration (SCN0011)

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Table 2 – Emissions by Production Scenario

	General Plant Areas	G-22 Unit (Production Scenarios)				G-1113 Unit (Production Scenarios)		Omni Unit (Production Scenarios)					G-134a cGMP Unit	Facility Total ***
		G-22	G-11/12	G-143a	G-113/114	Existing	Expanded	G-113/114	G-143a/134a cGMP	G-11/12	G-22	MF **		
PM_{10}	18.50	-	-	-	-	0.21	0.21	-	-	-	-	-	-	18.71
SO_2	0.79	-	-	-	-	-	-	-	-	-		< 0.01	-	0.79
NO_x	55.46	-	-	-	-	-	-	-	-	-	-	-	-	55.46
CO	37.67	-	-	-	-	-	-	-	-	-	-	-	-	37.67
VOC	71.00	4.39	13.16	7.44	2.80	252.41	192.98	50.98	12.00	45.98	8.84	51.10	0.14	387.81
ODS*	788.20	341.76	88.25	8.21	20.76	83.25	55.25	325.03	45.27	138.07	36.56	127.35	1.83	1,540.07
VOC TAP Speciation														
Benzene	0.002	-	-	-	-	-	-	-	-	-	-	-	-	0.002
Bromoform	< 0.001	-	-	-	-	-	-	-	-	-	-	-	-	< 0.001
Methyl Bromide	< 0.001	-	-	-	-	-	-	-	-	-	-	-	-	< 0.001
Carbon Tetrachloride	4.51	-	1.42	-	0.004	-	-	1.51	-	1.39	-	0.01	-	7.44
Chloroethane	0.04	-	-	-	-	-	-	-	-	-	-	-	-	0.04
Chloroform	5.93	3.02	-	-	-	-	-	-	-	-	4.99	-	-	13.94
Methyl Chloride	0.04	-	-	-	-	15.33	17.52	-	-	-	-	-	-	17.56
Cumene	< 0.001	-	-	-	-	-	-	-	-	-	-	-	-	< 0.001
1,1-Dichloroethane	< 0.001	-	-	-	-	-	-	-	-	-	-	-	-	< 0.001
1,2-Dichloroethane	0.04	-	-	-	-	-	-	-	-	-	-	-	-	0.04
Ethyl Benzene	< 0.001	-	-	-	-	-	-	-	-	-	-	-	-	< 0.001
Formaldehyde	0.05	-	-	-	-	-	-	-	-	-	-	-	-	0.05
n-Hexane	0.002	-	-	-	-	-	-	-	-	-	-	-	-	0.001
2,2,4-Trimethylpentane	< 0.001	-	-	-	-	-	-	-	-	-	-	-	-	< 0.001
Methyl Ethyl Ketone	2.37	-	-	-	-	-	-	-	-	-	-	-	-	2.37
Methanol	3.56	-	-	-	-	93.85	70.57	-	-	-	-	-	-	97.41
Methyl Tertiary Butyl Ether	0.03	-	-	-	-	-	-	-	-	-	-	-	-	0.03
Phosgene	-	-	-	-	-	-	-	0.003	-	-	-	0.01	-	0.013
1,1,2,2-Tetrachloroethane	0.002	-	-	-	-	-	-	-	-	-	-	-	-	0.002
Toluene	0.002	-	-	-	-	-	-	-	-	-	-	-	-	0.002
Trichloroethylene	< 0.001	-	-	-	-	-	-	-	-	-	-	-	-	< 0.001
Vinyl Chloride	0.07	-	-	-	-	-	-	-	-	-	-	-	-	0.07
Vinylidene Chloride	0.73	-	-	4.86	-	-	-	-	5.32	-	-	4.24	-	10.91
Xylene	14.04	-	-	-	-	-	-	-	-	-	-	-	-	14.04
Non-VOC TAP Speciation		-	-	-	-	-	-	-	-	-	-	-	-	-
Antimony	< 0.001	-	-	0.06	0.06	-	-	-	-	-	-	-	-	0.06
Antimony Cmpds.	< 0.001	-	-	0.13	0.13	-	-	-	-	-	-	-	-	0.13
Cobalt	0.001	-	-	-	-	-	-	-	-	-	-	-	-	0.001
Cobalt Cmpds.	0.008	-	-	-	-	-	-	-	-	-	-	-	-	0.008
Chlorine	0.01	0.28	0.31	0.23	2.25	-	-	7.95	0.26	0.32	2.65	6.36	-	10.21
Dichloromethane	0.001	-	-	-	-	-	-	-	-	-	-	-	-	0.001
Hydrochloric Acid	5.07	7.12	0.91	1.82	1.57	0.22	0.07	3.60	3.74	1.19	2.62	2.60	-	16.15
Hydrogen Fluoride	3.12	3.85	1.62	4.59	2.05	-	-	2.60	4.24	1.65	2.91	3.68	-	11.95
Sulfuric Acid	0.11	0.05	0.05	0.05	0.05	0.03	0.03	0.03	0.03	0.03	0.03	0.03	-	0.22
Tetrachloroethylene	2.64	-	-	-	0.81	-	-	1.96	-	-	-	1.53	-	5.41
1,1,1-Trichloroethane	0.82	-	-	0.13	-	-	-	-	2.71	-	-	1.25	-	3.66
Titanium (IV)	-	-	-	5.16	-	-	-	-	5.16	-	-	-	-	10.32

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	General Plant Areas	G-22 Unit (Production Scenarios)				G-1113 Unit (Production Scenarios)		Omni Unit (Production Scenarios)					G-134a cGMP Unit	Facility Total ***
		G-22	G-11/12	G-143a	G-113/114	Existing	Expanded	G-113/114	G-143a/134a cGMP	G-11/12	G-22	MF **		
Chloride														
Zinc Cmpds.	-	-	-	-	-	0.20	0.20	-	-	-	-			0.20

* Ozone Depleting Substances (ODS), Class I and II
** Multi-Feed Production (simultaneous production of G-143a and G-113/114
*** Facility total emissions for each pollutant are based on the production scenario with the greatest emissions for that pollutant.

IV. REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

Applicability and Exemptions of Selected Subject Items

ID No.	Requirement	Note
801 - HCl Scrubber	40 CFR 63 Subpart SS – National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices, and Routing to a Fuel Gas System or Process	Owners or operators that vent emissions through a closed vent system to a non-flare control device shall meet the requirements in 40 CFR 63.983 for closed vent systems. [40 CFR 63.982(c)]
		Owners or operators shall meet the requirements applicable to the control devices being used in 40 CFR 63.988, 63.990, or 63.995. [40 CFR 63.982(c)(2)]
		Owners or operators subject to halogen reduction device requirements under a referencing subpart must comply with 40 CFR 63.994. [40 CFR 63.982(c)(2)]
	40 CFR 63 Subpart EEEE – National Emission Standards for Hazardous Air Pollutnats (NESHAP): Organic Liquids Distribution (OLD) (non-gasoline)	**DOES NOT APPLY.** Scrubber does not control emissions of organic liquids as defined in 40 CFR 63.2406.

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ID No.	Requirement	Note
(continued) 801 - HCl Scrubber	40 CFR 63 Subpart FFFF – NESHAP: Miscellaneous Organic Chemical Manufacturing (MON)	Reduce HAP emissions by 95% or greater or to an outlet concentration of 20 parts per million by volume (ppmv) or less of hydrogen halide or halogen HAP. [40 CFR 63.2470, Table 4.1.b.ii]
	40 CFR 63 Subpart NNNNN – NESHAP: Hydrochloric Acid (HCl) Production	Reduce HCl emissions by 99% or greater or to an outlet concentration of 20 ppmv or less. [40 CFR 63.9000(a), Table 1]
		Maintain the daily average scrubber inlet liquid or recirculating liquid flow rate, as appropriate, above the operating limit. [40 CFR 63.9020(b), Table 2]
		Maintain the daily average scrubber effluent pH within the operating limits. [40 CFR 63.9020(b), Table 2]
	LAC 33:III.2115 – Waste Gas Disposal	**EXEMPT.** Vent stream does not emit more than 100 pounds of VOC in any continuous 24-hour period.
830 – Tank 147 855A – Tank 1 855B – Tank 2	40 CFR 60 Subpart Kb Standards of Performance for Volatile Organic Liquid Storage Vessels	**DOES NOT APPLY.** Tanks were constructed before July 23, 1984 and have not been modified or reconstructed. [40 CFR 60.110b(a)]
	40 CFR 63.119 (Subpart G) National Emission Standards for Organic Hazardous Air Pollutants (HON) From the Synthetic Organic Chemical Manufacturing Industry (SOCMI) for Process Vents, Storage Vessels, Transfer Operations, and Wastewater	Operate and maintain a closed vent system and control device meeting the requirements of 40 CFR 63.119(e). [40 CFR 63.119(a)(2)] Honeywell is in the process of installing an internal floating roof in these tanks. Upon installation of these roofs, Honeywell will comply with the requirements for an internal floating roof specified in this Subpart.
		The owner or operator who elects to use a closed vent system and control device to comply with the requirements of 40 CFR 63.119(a)(1) or (a)(2) shall design and operate the control device to reduce inlet emissions of total organic HAPs by 95 percent or greater. [40 CFR 63.119(e)(1)]
	40 CFR 63 Subpart EEEE NESHAP: Organic Liquids Distribution (Non-Gasoline)	**DOES NOT APPLY.** Storage tanks are subject to the SOCMI HON. [40 CFR 63.2338(c)(1)]
	40 CFR 63 Subpart FFFF NESHAP: Miscellaneous Organic Chemical Manufacturing (MON)	**DOES NOT APPLY.** Storage tanks are subject to the SOCMI HON. [40 CFR 63.2435(b)(3)]

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ID No.	Requirement	Note
(continued) 830 – Tank 147 855A – Tank 1 855B – Tank 2	40 CFR 64 Compliance Assurance Monitoring (CAM)	**DOES NOT APPLY.** Emissions are subject to emissions limitations or standards proposed by the Administrator after November 15, 1990 pursuant to Section 111 or 112 of the Clean Air Act. [40 CFR 64.3(b)(1)(i)].
	LAC 33:III.2103 – Storage of Volatile Organic Compounds (VOCs)	Storage vessels greater than 40,000 gallons for any VOC having a true vapor pressure of 1.5 psia or greater must be a pressure tank or have a submerged fill pipe and an floating roof or other vapor control device. [LAC 33:III.2103.B]
	LAC 33:III.5109.A – Emission Control and Reduction Requirements and Standards	Control emissions of Class I and II toxic air pollutants (TAPs) to a degree that constitutes maximum achievable control technology (MACT). Complying with the fixed roof and internal floating roof requirements of HON 40 CFR 63.119(b) (of Subpart G) constitutes MACT.
902 – Paint Booth Vent 903 – paint Dryer Vent 919 – Ton/Half-Ton Cylinder Painting	40 CFR 63 Subpart MMMM – NESHAP: Surface Coating of Miscellaneous Metal Parts and Products	Limit organic HAP emissions to no more than 2.6 lb (0.31 kg) organic HAP per gallon (liter) coating solids used during each 12-month compliance period. [40 CFR 63.3890(b)(1)]
	LAC 33:III.2123 – Organic Solvents	No person shall cause, suffer, allow, or permit VOC emissions from the surface coating of any materials affected by LAC 33:III.2123.C to exceed the emission limits of 3.0 lbs per gallon of coating as applied (minus water and exempt solvent). [LAC 33:III.2123.C.9]
1002 – Boiler No. 3	40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	**DOES NOT APPLY.** Boiler commenced construction prior to June 9, 1989 and has not been modified or reconstructed.
	LAC 33:III.1101 – Control of Air Pollution from Smoke	Emissions of smoke from combustion devices shall be controlled so shade is less than 20% opacity. [LAC 33:III.1101.B]
	LAC 33:III.1313 – Emissions from Fuel Burning Equipment	Particulate matter emissions shall be limited to 0.6 lb/MM BTU of heat input. [LAC 33:III.1313.C]

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(continued) 1002 – Boiler No. 3	LAC 33:III.Chapter 22 – Control of Emissions of Nitrogen Oxides	For industrial boilers with a rated capacity greater than or equal to 40 MM BTU/hr but less than 80 MM BTU/hr, NOx emissions must be less than 0.20 lb/MM BTU. [LAC 33:III.2201.D.1]
	LAC 33:III.Chapter 51 – Comprehensive TAP Emission Control Program	**EXEMPT.** Emissions from the combustion of Group 1 virgin fossil fuels are exempt from LAC 33:III.Chapter 51. [LAC 33:III.5105.B.3]
1003 – Boiler No. 4	40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Boiler is fired on natural gas only. Comply with the necessary recordkeeping as required by this Subpart. No reporting is required.
	LAC 33:III.1101 – Control of Air Pollution from Smoke	Emissions of smoke from combustion devices shall be controlled so shade is less than 20% opacity. [LAC 33:III.1101.B]
	LAC 33:III.1313 – Emissions from Fuel Burning Equipment	Particulate matter emissions shall be limited to 0.6 lb/MM BTU of heat input. [LAC 33:III.1313.C]
	LAC 33:III.Chapter 22 – Control of Emissions of Nitrogen Oxides	For industrial boilers with a rated capacity greater than or equal to 40 MM BTU/hr but less than 80 MM BTU/hr, NOx emissions must be less than 0.20 lb/MM BTU. [LAC 33:III.2201.D.1]
	LAC 33:III.Chapter 51 – Comprehensive TAP Emission Control Program	**EXEMPT.** Emissions from the combustion of Group 1 virgin fossil fuels are exempt from LAC 33:III.Chapter 51. [LAC 33:III.5105.B.3]
1004 – Main Cooling Water Tower	40 CFR 63 Subpart G – SOCMI HON	Heat exchange systems cooling process equipment or a process fluid that is part of a chemical manufacturing process unit subject to 40 CFR 63 Subpart F shall implement a monitoring and leak detection and repair program.
	40 CFR 63 Subpart Q – NESHAP from Industrial Cooling Towers	**DOES NOT APPLY.** Cooling tower was not operated with chromium-based water treatment chemicals on or after September 8, 1994.
	40 CFR 63 Subpart FFFF – NESHAP: MON	Comply with the requirements of 40 CFR 63.104 of Subpart F and the requirements referenced therein, except as specified in 40 CFR 63.2490.

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Prevention of Significant Deterioration (PSD)

The Baton Rouge Plant is a major stationary source. There are no changes being proposed in this permit that would meet the definition of a major modification under the PSD program. Therefore, PSD review does not apply.

Nonattainment New Source Review (NNSR)

The Baton Rouge Plant is located in East Baton Rouge Parish which is designated as a severe ozone nonattainment area. There are no changes being proposed in this permit that would meet the definition of a major modification under the NNSR program. Therefore, NNSR review does not apply.

Streamlined Equipment Leak Monitoring Program

It is required that the Baton Rouge Plant comply with a streamlined equipment leak monitoring program. Compliance with the streamlined program shall serve to comply with each of the fugitive emission monitoring programs being streamlined.

For the Baton Rouge Plant, fugitive emissions are subject to the requirements of 40 CFR 63 Subpart H, LAC 33:III.2122, and LAC 33:III.5109. Among these regulations, 40 CFR 63 Subpart H is the overall most stringent program. Therefore, fugitive emissions shall be monitored as required by this program (40 CFR 63 Subpart H).

Unit or Plant Site	Fugitive Source Description	Programs Being Streamlined	Stream Applicability	Overall Most Stringent Program
General Plant Areas	1013 General Plant Fugitive Emissions	40 CFR 63 Subpart H (HON) La Non-HON MACT LAC 33:III.2122	5% VOHAP 5% Class I & II TAPs 10% VOC	40 CFR 63 Subpart H (HON)
G-22 Unit	104 G-22 Production Fugitive Emissions			
	106 G-11/12 Production Fugitive Emissions			
	107 G-143a Production Fugitive Emissions			
	108 G-113/114 Production Fugitive Emissions			

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Unit or Plant Site	Fugitive Source Description	Programs Being Streamlined	Stream Applicability	Overall Most Stringent Program
Omni Unit	307 G-113/114 Production Fugitive Emissions	40 CFR 63 Subpart H (HON)	5% VOHAP	40 CFR 63 Subpart H (HON)
	305 G-143a Production Fugitive Emissions			
	306 G-11/12 Production Fugitive Emissions	La Non-HON MACT	5% Class I & II TAPs	
	308 G-22 Production Fugitive Emissions	LAC 33:III.2122	10% VOC	
	309 G-143a & G-113/114 Fugitive Emissions			

MACT Requirements

The Baton Rouge Plant is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51. For all sources emitting Class I and II TAPs (facility-wide) above their respective minimum emission rates (MERs) as established in LAC 33:III.5112, Table 51.1, maximum achievable control technology (MACT) is required. MACT is not required for Class III or Supplemental TAPs, but compliance with all applicable provisions of the Louisiana Air Toxics Program, LAC 33:III.Chapter 51, is required. The impact of all TAP emissions must be below their respective Ambient Air Standards.

Air Quality Analysis

Dispersion Model(s) Used: None

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
N/A	--	--	--
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General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

V. PERMIT SHIELD

Honeywell did not apply for a permit shield.

VI. PERIODIC MONITORING

Periodic monitoring is required for certain sources in this permit. All periodic monitoring shall be conducted in accordance with state and federal regulations, as applicable. See the Facility Specific Requirements of the draft Part 70 permit for monitoring requirements.

VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H_2S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nitrogen Oxides (NO_X) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH_4), Ethane (C_2H_6), Carbon Disulfide (CS_2)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: $\geq$ 10 tons per year of any toxic air pollutant; $\geq$ 25 tons of total toxic air pollutants; and $\geq$ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM_{10} – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO_2) – An oxide of sulfur.

Sulfuric Acid (H_2SO_4) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.